

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT COURT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
MARY ELLEN RICHARDSON : CASE NO 5-18-00932  
Debtor :

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**DEBTOR'S ANSWER TO LBM SCRANTON, LLC'S MOTION TO DISMISS OR  
ALTERNATIVELY, CONVERT CASE TO CHAPTER 7**

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AND NOW COMES, Mary Ellen Richardson, the Debtor, and files an Answer to LBM  
Scranton, LLC's Motion to Dismiss or alternatively Convert case to Chapter 7 and states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The averments in Paragraph 4 of Movant's Motion are conclusions and  
strict proof hereof is demanded.
5. Denied. The averments in Paragraph 5 of Movant's Motion are conclusions and  
strict proof hereof is demanded.
6. Denied. The averments in Paragraph 6 of Movant's Motion are conclusions and  
strict proof hereof is demanded.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Denied. The averments in Paragraph 11 of Movant's Motion are conclusions and  
strict proof hereof is demanded.

12. Denied. The averments in Paragraph 12 of Movant's Motion are conclusions and strict proof hereof is demanded.

13. Denied. The averments in Paragraph 13 of Movant's Motion are conclusions and strict proof hereof is demanded.

14. Denied. The averments in Paragraph 14 of Movant's Motion are conclusions and strict proof hereof is demanded.

15. Denied. The averments in Paragraph 15 of Movant's Motion are conclusions and strict proof hereof is demanded.

16. Admitted.

17. Denied. The averments in Paragraph 17 of Movant's Motion are conclusions and strict proof hereof is demanded.

18. Denied. The averments in Paragraph 18 of Movant's Motion are conclusions and strict proof hereof is demanded.

19. Denied. The averments in Paragraph 19 of Movant's Motion are conclusions and strict proof hereof is demanded.

20. Denied. The averments in Paragraph 20 of Movant's Motion are conclusions and strict proof hereof is demanded.

21. Denied. The averments in Paragraph 21 of Movant's Motion are conclusions and strict proof hereof is demanded.

22. Denied. The averments in Paragraph 22 of Movant's Motion are conclusions and strict proof hereof is demanded.

23. Denied. The averments in Paragraph 23 of Movant's Motion are conclusions and

strict proof hereof is demanded.

24. Denied. The averments in Paragraph 24 of Movant's Motion are conclusions and strict proof hereof is demanded.

25. Denied. The averments in Paragraph 25 of Movant's Motion are conclusions and strict proof hereof is demanded.

26. Denied. The averments in Paragraph 26 of Movant's Motion are conclusions and strict proof hereof is demanded.

WHEREFORE, the Debtor respectfully requests that LBM Scranton, LLC's Motion to Dismiss or, convert case to Chapter 7 be denied.

Respectfully submitted,

Date: May 7, 2019

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on May 7, 2019, he caused a true and correct copy of Debtor's Answer to LBM Scranton, LLC's Motion to Dismiss or Convert case to Chapter 7 to be served via electronic filing in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Jonathan Olivetti, Esq. at jeo@olivettilawfirm.com

Dated May 7, 2019

/s/Tullio DeLuca  
Tullio DeLuca, Esquire